

LAW OFFICES OF
GERALD B. LEFCOURT, P.C.
A PROFESSIONAL CORPORATION
1776 BROADWAY, SUITE 2000
NEW YORK, N.Y. 10019

GERALD B. LEFCOURT
lefcourt@lefcourtlaw.com

TELEPHONE
(212) 737-0400
FACSIMILE
(212) 988-6192

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SHERYL E. REICH
reich@lefcourtlaw.com
FAITH A. FRIEDMAN
ffriedman@lefcourtlaw.com

January 7, 2020

VIA ECF

The Honorable J. Paul Oetken
United States District Judge
Southern District of New York
United States Courthouse
40 Foley Square
New York, NY 10007

United States v. Kukushkin, et al. 19 CR. 725 (JPO)

Dear Judge Oetken:

We are counsel to Andrey Kukushkin in the above referenced matter. We write to respectfully request an opportunity for the defense to reply to the government's recently filed opposition (Dkt. No. 61) to our December 12, 2019 application pursuant to §3504 (Dkt No. 45) and propose a deadline for that reply of January 9, 2020.

We thank the Court for its consideration.

Respectfully submitted,


Gerald B. Lefcourt

cc: All counsel (via ecf)